

EXHIBIT 3

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

PASQUALINA RAUSA,)
)
Plaintiff,)
) MDL NO. 16-2738
vs.) (FLW) (LHG)
)
JOHNSON & JOHNSON, et al.,) CASE NO.
) 3:20-cv-02947-FLW-LHG
Defendants.)

WEDNESDAY, JANUARY 27, 2021
Remote deposition of Pasqualina Rausa,
conducted at the location of the witness in Ponte Vedra,
Florida, commencing at 12:58 p.m., on the above date,
before Dianne N. Sarkisian, Certified Shorthand Reporter
and Registered Professional Reporter.

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1 that?

2 A. I think he might have, you know, once in
3 a while use them, yeah.

4 Q. Did you ever have a [REDACTED] or any
5 other type of device like that?

6 A. No, nothing.

7 Q. You never had an [REDACTED]?

8 A. No, nothing.

9 Q. And then at some point you had a [REDACTED]
10 [REDACTED]; is that correct?

11 A. After my second child, I had a [REDACTED]
12 [REDACTED].

13 Q. So that would have been in 1988?

14 A. Yeah.

15 Q. Did they do the [REDACTED] right
16 after you delivered?

17 A. No. I think I had it done in June and I
18 delivered in March, the end of March. Danny was
19 born [REDACTED], and I had it done sometime in
20 June.

21 Q. Which doctor did that procedure?

22 A. Well, at that point I was living in the
23 Bronx with my mom because we had sold the condo we
24 had in Queens, and we had bought the house in
25 Rockland County and we couldn't move into it, so I